

CIVIL ACTION NO: 05-CV-40072 FDS

PLAINTIFF'S SECOND  
REQUEST FOR PRODUCTION  
OF DOCUMENT TO  
DEFENDANT, USF & G

Request 2: Any documents in the possession of USF & G which purports to demand that Landworks return to the Shrewsbury Project referenced in the Plaintiff's Complaint during the calendar year 2005.

Request 3: Any documents in the possession of USF & G in which Landworks states an unwillingness to return to the Shrewsbury Project referenced in the Plaintiff's Complaint during the calendar year of 2005.

Request 4: Any documents which serve as, or purports to serve as, policy manuals for surety claims adjustors in which the procedures and policies for investigation of claims on public projects in Massachusetts are stated.

Request 5: Any documents which demonstrate USF & G's compliance with any policy manuals identified in Request 4 with regard to Landworks' claim at the Shrewsbury Project referenced in the Plaintiff's Complaint.

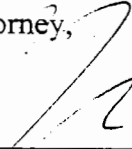
Request 6: For each and every lawsuit in which USF & G was a party in a Massachusetts state court, either superior or district court, regarding a public surety claim, whether as a Plaintiff, Defendant or third-party Plaintiff or third-party Defendant, from 2001 to the present, provide the Complaint, the Answer, the Third-party Complaint and Answer or any and all cross-claims or counterclaims, as well as replies.

Request 7: Copies of any and all correspondence, including e-mail traffic, between any claims adjustor or agent of USF & G and any representative of Lovett Silverman from 2005-06 that in any way references Landworks.

Request 8: If any site work has been performed at the Shrewsbury Project which was within in the scope of Landworks' contract, provide any bids for performance of that work, contracts for performance of that work, invoices submitted for performance of that work and proof of payment for performance of that work.

Request 9: Please provide Lovett Silverman's file pertaining to its review of the site work at the Shrewsbury Project which is the subject of the Plaintiff's Complaint.

Respectfully Submitted,  
**Landworks Creations, LLC**  
By its attorney,



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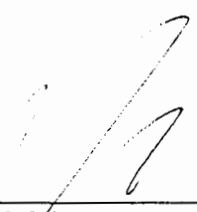
Robert N. Meltzer, BBO #564745  
PO Box 1459  
Framingham, MA 01701  
Phone: (508) 872-7116

Dated: February 7, 2006

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this day I served a copy of the foregoing on all counsel of record by mailing the same, postage prepaid, to:

Hermes, Netburn, O'Connor & Spearing  
265 Franklin Street, Seventh Floor  
Boston, MA 02110-3113  
Attn: Eric C. Hipp, Esq. ,

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Robert N. Meltzer

February 7, 2006